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JAN 28 1901

JAMES H. McKENNEY,
Clerk.

Supreme Court of the United States.

OCTOBER TERM, 1900.

No. ~~103~~ 24.

THE UNITED STATES,

Appellant,

against

THE SOUTHERN PACIFIC RAILROAD COMPANY
(D. O. MILLS and HOMER S. KING, Trustees), and
THE CENTRAL TRUST COMPANY OF NEW YORK,

Appellees.

CROSS APPEAL FROM THE UNITED STATES CIRCUIT COURT OF
APPEALS FOR THE NINTH CIRCUIT.

BRIEF FOR APPELLEES.

L. E. PAYSON,
MAXWELL EVARTS,

Of Counsel for Appellees.

3007

SUPREME COURT OF THE UNITED STATES.

OCTOBER TERM, 1900.

No. 185.

THE UNITED STATES,
Appellant,

VS.

THE SOUTHERN PACIFIC RAIL-
ROAD COMPANY (D. O. MILLS
and HOMER S. KING, Trustees),
and THE CENTRAL TRUST
COMPANY OF NEW YORK,
Appellees.

CROSS APPEAL FROM THE UNITED STATES CIR-
CUIT COURT OF APPEALS FOR THE NINTH
CIRCUIT.

BRIEF OF APPELLEES.

The main question upon this cross-appeal is whether the decision of both courts below that all purchases from the Southern Pacific Railroad Company of the lands erroneously patented to

the Railroad by the Government were protected by the adjustment acts of March 3, 1887 (24 U. S., Stat., 556), and March 2, 1896 (29 U. S. Stat., 42), as construed by this court in the two Winona cases (165 U. S., 462 and 483) is right. As this is substantially the same question which was raised in the case of the United States vs. the Southern Pacific Railroad Company, which is No. 186 upon the present docket of this Court, and is to be argued with this case, we have considered it unnecessary to here repeat at length our argument presented in that case, and we respectfully refer the Court to the brief in No. 186 for our views upon the subject.

There is, however, an additional reason why this cross-appeal should be dismissed which is peculiar to this particular case. In subdivision IX. of the bill of complaint (Main Record in No. 152, p. 15), it is stated:

“That the officers of the interior department have erroneously and without any authority of law caused to be issued to defendant Southern Pacific Railroad Company patents of the United States, in due form of law, for the tracts of land described in plaintiff's exhibit “A” hereto attached and made a part hereof.”

Subsequently and in subdivision XII. of the bill the only prayer of the bill which seeks to cancel any patents from the Government to the Railroad is as follows :

“ Your orators pray that their title to said lands described in said Exhibit “A” hereto annexed may be quieted ; that said pretended patents be vacated and decreed to be void.”

Now, the only patents which the bill asks to have canceled are those conveying the lands described in Exhibit “A” to the bill, and it appears, from an examination of the record, that none of the land excepted from the operation of the final decree, upon the ground that it had been sold to *bona fide* purchasers (Record, p. 353 *et seq.*), is a part of the land described in Exhibit “A,” attached to the complaint (see Appendix), and that, therefore, there is no prayer in the bill asking that the patents covering the land conveyed by the Railroad to *bona fide* purchasers should be canceled.

We take it that it is clear that the rights of *bona fide* purchasers in the land erroneously patented to the United States cannot be annulled and the patents for such land canceled by a bill seeking simply to remove a cloud upon the title

to land of the complainant, and that all relief seeking the cancellation of patents is necessarily limited to the patents which the bill specifically asks to be canceled.

As to this, the Circuit Court of Appeals said, in its opinion, at page 2671 of the main record, in No. 152 :

"We are further of the opinion that the bill of complaint did not call for the cancellation of the patents for the lands described. The bill alleged that the officers of the Interior Department had erroneously and without any authority of law caused to be issued to the defendant Southern Pacific Railroad Company patents of the United States in due form of law, for the tracts of land described in plaintiffs' Exhibit "A" attached to the complaint. The prayer of the bill was that plaintiffs' title to the lands described in Exhibit "A" should be quieted, and that the pretended patents for said lands be vacated and decreed to be void, etc. The lands excepted from the decree as having been sold by the Southern Pacific Company to *bona fide* purchasers who purchased the same in good faith and for value, are not described in exhibit "A," and were not therefore properly involved in the suit for the cancellation of patents."

In the case of *Dick vs. Foraker*, 155 U. S., 404, 414, it was said :

"The appellee then, seeks to have a cloud removed from his title when he holds no title whatever ; for, of course, it follows that if the court was without jurisdiction the decree by it rendered was utterly void, and the sale, having been made under the decree, was equally vicious and wholly null. The rule in ejectment is that the plaintiff must recover on the strength of his own title, and not on the weakness of the title of his adversary. A like rule obtains in an equitable action to remove a cloud from a title ; and title in the complainant is of the essence of the right to relief. In *Frost v. Spitley*, 121 U. S., 552, 556, we said : 'Under the jurisdiction and practice in equity independently of statute, the object of a bill to remove a cloud upon title, and to quiet the possession of real estate, is to protect the owner of the legal title from being disturbed in his possession, or harassed by suits in regard to that title ; and the bill cannot be maintained without clear proof of both possession and legal title in the plaintiff.' *Alexander v. Pendleton*, 8 Cranch., 462 ; *Peirsoll v. Elliott*, 6 Pet., 95 ; *Orton v. Smith*, 18 How., 263 ; *Crews v. Burcham*, 1 Black., 352 ; *Ward v. Chamberlain*, 2 Black., 430. As observed by Mr. Justice GRIER in *Orton v. Smith*, 'Those only who have a clear, legal and equitable title to land, connected with possession, have any right to claim the interference of

a court of equity to give them peace or dissipate a cloud on the title.' 18 How., 265.

"The law of Arkansas authorizes a bill to remove a cloud on a title whether or not the complainant be in possession. Act of March 26, 1891, No. 74, Stats. of 1891, 132. By reason of this statute a bill in equity may be maintained in the Circuit Court of the United States by a person not in possession against another who is also out of possession. *Holland v. Challen*, 110 U. S., 15, 25. But this does not make the complainant's rights any the less dependent upon title in him nor does it put him in a position to have a cloud removed from a title which has no existence. In *Frost v. Spitley*, *supra*, it was said, p. 557:

"A statute of Nebraska authorizes an action to be brought 'by any person or persons, whether in actual possession or not, claiming title to real estate, against any person or persons who claim an adverse estate or interest therein, for the purpose of determining such estate or interest, and quieting the title to said real estate'. Nebraska Stat., Feb. 24, 1873; Rev. Stat., 1873, p. 882.

. . . The requisite of the plaintiff's possession is thus dispensed with, but not the other rules which govern the jurisdiction of courts of equity over such bills. Under that statute, as under the general jurisdiction in equity, it is 'the title', that is to say, the legal title, to real estate, that is to be quieted

against claims of adverse estates or interests. In *State v. Sioux City & Pacific Railroad*, the Supreme Court of Nebraska said: 'Whatever the rule may be as to a party in actual possession, it is clear that a party not in possession must possess the legal title, in order to maintain the action'. 7 Nebraska, 357, 376. And in *Holland v. Challen*, above cited, this court said: 'Undoubtedly, as a foundation for the relief sought, the plaintiff must show that he has a legal title to the premises'. The necessary conclusion is, that Spitley, not having the legal title of the lots in question, cannot maintain his bill for the purpose of removing a cloud on the title. * * *

"There are other contentions urged, but they are all covered by what has been already said. They either arise from the erroneous postulate that the complainant's title is not void, but simply voidable, or are predicted on the equally unsound premise that one having no title can successfully invoke the aid of a court of equity to 'remove a cloud' from such non-existent title; that is to say, can ask a court to subtract something from nothing."

In the case of *United States vs. Winona and St. Paul Railroad*, 67 Fed. Rep., 948, it was said at page 959:

"It is not difficult to determine whether the certificates issued in this case were void

or voidable when tested by these rules. Jurisdiction of the subject-matter is the power to deal with the general abstract question, to hear the particular facts in any case relating to this question, and to determine whether or not they are sufficient to invoke the exercise of that power. The test of jurisdiction is whether the tribunal has power to enter upon the inquiry, not whether its conclusion in the course of it is right or wrong. *Foltz v. Railway Co.*, 8 C. C. A., 635, 60 Fed. 316, 318, and cases cited.

“ When these certificates were issued, the Winona Railroad Company had undoubtedly applied to the land department for conveyances of the lands in controversy to the state for its benefit. These lands were a part of the public lands of the United States, the disposition of which had been intrusted to that department by the acts of congress which established it and defined the powers and duties of its officers. Moreover, the acts of congress under which the Winona Company claimed these lands expressly provided, as we have seen, that the secretary of the interior should indicate the lands granted under them in all cases. The conclusion is irresistible that these acts conferred the power and imposed the duty upon the officers of the land department to hear and determine the ultimate question whether or not the railroad company was entitled to

these lands under its grants, and to 'indicate' the lands granted by certificates or patents to the state. In no other way could they have discharged the duties these acts imposed upon them. In deciding this question they necessarily considered whether or not the railroad company had so far complied with the acts granting the lands that it had earned them, the character of the lands themselves, and the class to which they belonged, the time of the definite location of the line of the railroad, the homestead entries and pre-emption filings that were then upon the lands, the cancellation of all these entries and filings that had been made, and finally, the legal effect of all these and all other material facts upon the claim of the railroad company to receive the lands under the acts of congress. It now appears that they were mistaken as to the legal effect of these facts, but the question they decided was one which the acts of congress authorized and required them to decide—one which they were obliged to decide before they issued the certificates; and, although their decision and their conveyances evidenced by these certificates may be voidable, they are not absolutely void. *They are impregnable to collateral attack, and they conveyed the legal title to the lands to the state and its grantees."*

Our proposition is simply that no relief can

be had under the bill of complaint in this suit as to any lands purchased from the railroad by *bona fide* purchasers, for the reason that the bill does not ask to cancel the patents conveying such land to the Railroad Company, but is limited in its relief in this regard to the land conveyed by the patents, which it specifically asks to have canceled. In other words, a patent of lands from the Government, however erroneously obtained, cannot be attacked collaterally, and can only be set aside in a direct proceeding for that purpose.

With this one additional suggestion, we respectfully submit the case upon our brief in the case of United States vs. Southern Pacific Railroad, No. 186, submitted and argued with this case.

L. E. PAYSON,
MAXWELL EVARTS,
Of Counsel for Appellees.

APPENDIX.

STATEMENT OF LANDS *excepted from Decree as held by bona fide Purchasers, showing Patents and Sales thereof, with references to pages in record in main suit No. 152.*

| DESCRIPTION OF LANDS. | | | | PATENTS. | | | | SALES. | | | | REMARKS. |
|----------------------------|------|-------|-------|-----------|----------|--------------|-------|--------|--------------|---------|---------|----------|
| SUBDIVISIONS. | Sec. | T. N. | R. W. | Br. Line. | M. Line. | Dates. | Tran. | Cont. | Dates. | Tran. | | |
| Fractl. N. 1/2.. | 7 | 7 | 18 | 27 | | 28 Nov. '94 | 2576 | 11206 | 21 Sept. '92 | 2544 | Deeded. | |
| N. 1/2..... | 9 | " | " | " | | " " " | " | 11207 | " " " | " | | |
| N. 1/2 of N. E. 1/4..... | 1 | 8 | 14 | 26 | | 22 Dec. '94 | 2563 | 4955 | 7 Nov. '85 | " | | |
| S. W. 1/4 of N. E. 1/4.. | | | | | | | | | | | | |
| N. W. 1/4..... | " | " | " | " | " | " | " | 4954 | " | " | | |
| N. W. 1/4 of S. E. 1/4.... | " | " | " | " | " | " | " | 4956 | " | " | | |
| S. W. 1/4..... | " | " | " | " | " | " | " | 4957 | " | " | | |
| N. E. 1/4..... | 3 | " | " | " | " | " | " | 5028 | 3 Dec. '85 | " | | |
| N. W. 1/4..... | " | " | " | " | " | " | " | 5029 | " | " | | |
| S. E. 1/4..... | " | " | " | " | " | " | " | 5211 | 12 Jan. '86 | " | | |
| S. W. 1/4..... | " | " | " | " | " | " | " | 5458 | 16 Mar. '86 | " | | |
| N. 1/2 of N. E. 1/4..... | 5 | " | " | " | " | " | " | 5044 | 9 Dec. '85 | " | | |
| N. 1/2 of N. W. 1/4..... | | | | | | | | | | | | |
| N. 1/2 of S. W. 1/4..... | 11 | " | " | " | " | " | " | 4988 | 21 Nov. '85 | " | | |
| S. E. 1/4..... | | | | | | | | | | | | |
| N. 1/2..... | " | " | " | " | " | " | " | 5019 | 1 Dec. '85 | " | | |
| N. E. 1/4..... | " | " | " | " | " | " | " | 5019 | " | " | | |
| N. E. 1/4..... | 1 | 8 | 16 | 27 | | 28 Nov. '94 | 2576 | 7628 | 30 June, '87 | " | | |
| N. W. 1/4..... | " | " | " | " | " | " | " | 7629 | " | " | | |
| S. E. 1/4..... | " | " | " | " | " | " | " | 7630 | " | " | | |
| S. W. 1/4..... | " | " | " | " | " | " | " | 7631 | " | " | | |
| N. E. 1/4..... | 3 | " | " | " | " | " | " | 7684 | " | " | | |
| N. W. 1/4..... | " | " | " | " | " | " | " | 7685 | " | " | | |
| S. E. 1/4..... | " | " | " | " | " | " | " | 7686 | " | " | | |
| S. W. 1/4..... | " | " | " | " | " | " | " | 7687 | " | " | | |
| N. E. 1/4..... | 5 | " | " | " | " | " | " | 7688 | " | 2545 | | |
| N. W. 1/4..... | " | " | " | " | " | " | " | 7689 | " | " | | |
| S. E. 1/4..... | " | " | " | " | " | " | " | 7690 | " | " | | |
| S. W. 1/4..... | " | " | " | " | " | " | " | 7691 | " | " | | |
| All..... | 11 | " | " | " | " | " | " | 7500 | 31 May, '87 | " | | |
| N. W. 1/4..... | 13 | " | " | " | " | " | " | 8406 | 28 Sept. '87 | " | | |
| S. E. 1/4..... | " | " | " | " | " | " | " | 8407 | " | " | | |
| Fractl. N. 1/2..... | 19 | 9 | 14 | 22 | | 10 July, '94 | 1989 | 5041 | 8 Dec. '85 | " | | |
| S. E. 1/4..... | " | " | " | " | " | " | " | 5042 | " | " | | |
| S. W. 1/4..... | " | " | " | " | " | " | " | 5043 | " | " | | |
| E. 1/2..... | 21 | " | " | " | " | " | " | 4593 | 9 May, '85 | " | | |
| W. 1/2..... | " | " | " | " | " | " | " | 4672 | 15 June, '85 | " | | |
| All..... | 23 | " | " | " | " | " | " | 4576 | 5 May, '85 | " | | |
| All..... | 25 | " | " | " | " | " | " | 4533 | 16 April '85 | " | | |
| N. 1/2..... | 27 | " | " | " | " | " | " | 4603 | 12 May, '85 | " | | |
| N. 1/2..... | 29 | " | " | " | " | " | " | 4985 | 21 Nov. '85 | " | | |
| S. 1/2..... | " | " | " | " | " | " | " | 4986 | " | " | | |
| E. 1/2..... | 31 | " | " | " | " | " | " | 4987 | " | " | | |
| N. W. 1/4..... | " | " | " | " | " | " | " | 4998 | 25 Nov. '85 | 2546 | | |
| S. W. 1/4..... | " | " | " | " | " | " | " | 4999 | 25 Nov. '85 | Deeded. | | |
| N. 1/2..... | 33 | " | " | " | " | " | " | 5026 | 3 Dec. '85 | Deeded. | | |
| S. 1/2..... | " | " | " | " | " | " | " | 5027 | 3 Dec. '85 | " | | |

| DESCRIPTION OF LANDS. | | | | PATENTS. | | | | SALES. | | | REMARKS. |
|------------------------------|------|-------|-------|-----------|----------|--------------|--------|--------|---------------|--------|----------|
| SUBDIVISIONS. | Sec. | T. N. | R. W. | Br. Line. | M. Line. | Dates. | Trans. | Cont. | Dates. | Trans. | |
| All..... | 35 | 9 | 14 | | 22 | 10 July, '94 | 1989 | 5018 | 3 Dec. '85 | 2546 | Deeded. |
| N. E. ¼..... | 17 | 9 | 15 | | | | | 9654 | 1 June, '88 | | |
| S. E. ¼..... | | | | | | | | 9655 | | | |
| N. W. ¼..... | | | | | | | | 7678 | 30 June, '87 | | |
| S. W. ¼..... | | | | | | | | 7679 | | | |
| N. E. ¼..... | 19 | | | | | | | 7674 | | | |
| N. W. ¼..... | | | | | | | | 7675 | | | |
| S. E. ¼..... | | | | | | | | 7676 | | | |
| S. W. ¼..... | | | | | | | | 7677 | | | |
| S. E. ¼..... | 21 | | | | | | | 7758 | 11 July, '87 | | Deeded. |
| S. W. ¼..... | | | | | | | | 7759 | | | Deeded. |
| N. ½..... | 23 | | | | | | | 7733 | 9 July, '87 | | |
| S. ½..... | | | | | | | | 7734 | | | |
| N. E. ¼..... | 25 | | | | | | | 7620 | 28 June, '87 | | |
| N. W. ¼..... | | | | | | | | 7621 | | | |
| S. E. ¼..... | | | | | | | | 6707 | 11 April, '87 | | Deeded. |
| S. W. ¼..... | | | | | | | | 6708 | | | |
| N. ½..... | 27 | | | | | | | 7735 | 9 July, '89 | | Deeded. |
| S. ½ of S. W. ¼—S. E. ¼..... | | | | | | | | 7736 | | | Deeded. |
| N. E. ¼..... | 35 | | | | | | | 7828 | 16 July, '87 | | |
| N. ½ of N. W. ¼..... | | | | | | | | 7737 | 9 July, '87 | | |
| N. E. ¼..... | 13 | 9 | 16 | | | | | 7634 | 30 June, '87 | | |
| N. W. ¼..... | | | | | | | | 7635 | | | |
| S. E. ¼..... | | | | | | | | 7636 | | | |
| S. W. ¼..... | | | | | | | | 7637 | | | |
| N. E. ¼..... | 19 | | | 27 | | 28 Nov. '94 | 2576 | 7638 | | | |
| N. W. ¼..... | | | | | | | | 7639 | | | |
| S. E. ¼..... | | | | | | | | 7640 | | | |
| S. W. ¼..... | | | | | | | | 7641 | | | |
| N. E. ¼..... | 21 | | | | | | | 7642 | | | |
| N. W. ¼..... | | | | | | | | 7643 | | | |
| S. E. ¼..... | | | | | | | | 7644 | | | |
| S. W. ¼..... | | | | | | | | 7645 | | | |
| N. ½..... | 23 | | | | 22 | 10 July, '94 | 1989 | 9663 | 6 June, '88 | | Deeded. |
| N. E. ¼ of S. E. ¼..... | | | | | | | | 9621 | 21 May, '88 | | |
| E. ½ of N. E. ¼..... | 25 | | | | 27 | 27 July, '95 | 2585 | 7646 | 30 June, '87 | | |
| W. ½ of N. E. ¼..... | | | | | | | | 7646 | | | |
| N. W. ¼..... | | | | | | | | 7647 | | | |
| N. E. ¼ of S. E. ¼..... | | | | | 27 | 27 July, '95 | 2585 | 7648 | | | |
| N. W. ¼ of S. E. ¼..... | | | | | 27 | 28 Nov. '94 | 2576 | 7648 | | | |
| S. ½ of S. E. ¼..... | | | | | | | | 7648 | | | |
| S. W. ¼..... | | | | | | | | 7549 | | | 2547 |
| N. E. ¼..... | 27 | | | | | | | 7650 | | | |
| N. W. ¼..... | | | | | | | | 7651 | | | |
| S. E. ¼..... | | | | | | | | 7652 | | | |
| S. W. ¼..... | | | | | | | | 7653 | | | |

III.

| DESCRIPTION OF LANDS. | | | | PATENTS. | | | | SALES. | | | | REMARKS. |
|---------------------------|------|-------|-------|-----------|----------|--------------|-------|--------|---------------|-------|---------|----------|
| Subdivisions. | Sec. | T. N. | R. W. | Br. Line. | M. Line. | Dates. | Tran. | Cont. | Dates. | Tran. | | |
| N. W. 1/4 | 29 | 9 | 16 | 27 | | 28 Nov. '94 | 2576 | 7654 | 30 June, '87 | 2547 | Deeded. | |
| S. W. 1/4 | | | | | | | | 7655 | | | | |
| N. E. 1/4 | | | | | | | | 9339 | 10 Feb. '88 | | | |
| S. E. 1/4 | | | | | | | | 9340 | | | | |
| N. 1/2 of S. W. 1/4 | 13 | 8 | 16 | | | | | 8408 | 28 Sept. '87 | 2545 | Deeded. | |
| S. E. 1/4 of S. W. 1/4 | | | | | | | | 8408 | | | | |
| All | 15 | | | | | | | 4538 | 21 April, '85 | | | |
| N. E. 1/4 | 23 | | | | | | | 7632 | 30 June, '87 | | | |
| N. W. 1/4 | | | | | | | | 7633 | | | Deeded. | |
| S. E. 1/4—Lots 1, 2, 3, 4 | 9 | 8 | 17 | | | | | 3596 | 24 May, '84 | | | |
| Lot 1 | 27 | | | | | | | 3596 | | | | |
| All Fractl | 29 | | | | | | | 3596 | | | | |
| All Fractl | 31 | | | | | | | 3596 | | | do. | |
| All | 33 | | | | | | | 3596 | | | do. | |
| All Fractl | 35 | | | | | | | 3596 | | | do. | |
| S. W. 1/4 of S. W. 1/4 | 13 | 8 | 18 | | | | | 11330 | 18 Jan. '94 | | Deeded. | |
| Lots 1, 2, 3 | | | | | | | | 11330 | | | | |
| N. E. 1/4 | 15 | | | | | | | 11132 | 11 April, '92 | | | |
| N. W. 1/4 | | | | | | | | 11133 | | | | |
| S. E. 1/4 | | | | | | | | 11134 | | | Deeded. | |
| S. W. 1/4 | | | | | | | | 11135 | | | | |
| S. E. 1/4 of S. E. 1/4 | 17 | | | | | | | 11378 | 12 April, '95 | | | |
| W. 1/2 of S. E. 1/4 | | | | | | | | 11378 | | | | |
| E. 1/2 | 21 | | | | | | | 10955 | 25 Jan. '92 | | Deeded. | |
| S. W. 1/4 | | | | | | | | 11148 | 13 May, '92 | | | |
| All | 23 | | | | | | | 10955 | 25 Jan. '92 | | | |
| N. 1/2 of S. E. 1/4 | 7 | 9 | 13 | 22 | | 10 July, '94 | 1989 | 5057 | 11 Dec. '85 | | | |
| S. W. 1/4—N. 1/2 | | | | | | | | 5057 | 11 Dec. '85 | | Deeded. | |
| W. 1/2 of N. W. 1/4 | 9 | | | | | | | 6025 | 10 Nov. '86 | | Deeded. | |
| N. W. 1/4 of S. E. 1/4 | 17 | | | | | | | 4472 | 24 Mch. '85 | | | |
| W. 1/2 of N. E.—W. 1/2 | | | | | | | | 4472 | | | | |
| All | 19 | | | | | | | 4493 | 31 Mch. '85 | | | |
| N. E. 1/4 of N. W. 1/4 | 31 | | | | | | | 4494 | | | Deeded. | |
| W. 1/2 of N. W. 1/4 | | | | | | | | 4494 | | | | |
| N. W. 1/4 of S. W. 1/4 | | | | | | | | 4494 | | | | |
| N. E. 1/4 | 31 | 9 | 16 | 27 | | 28 Nov. '94 | 2576 | 8772 | 12 Nov. '87 | 2547 | | |
| S. W. 1/4 | | | | | | | | 7657 | 30 June, '87 | | Deeded. | |
| N. E. 1/4 | 33 | | | | | | | 7658 | | | | |
| N. W. 1/4 | | | | | | | | 7659 | | | | |
| S. E. 1/4 | | | | | | | | 7660 | | | | |
| S. W. 1/4 | | | | | | | | 7661 | | | Deeded. | |
| N. E. 1/4 | 35 | | | | | | | 7662 | | | | |
| N. W. 1/4 | | | | | | | | 7663 | | | | |
| S. E. 1/4 | | | | | | | | 7664 | | | | |
| S. W. 1/4 | | | | | | | | 7665 | | | Deeded. | |
| Lots 1, 2, 3, 4 | 33 | 9 | 17 | | | | | 3596 | 24 May, '84 | | | |